

THE HONORABLE JOHN H. CHUN

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

UNITED BROTHERHOOD OF CARPENTERS)	
AND JOINERS OF AMERICA, and PACIFIC)	
NORTHWEST REGIONAL COUNCIL OF)	NO.: 2:22-cv-00245-JHC
CARPENTERS,)	
)	DECLARATION OF
Plaintiffs,)	DANIEL M. SHANLEY
)	
v.)	
)	
EVELYN SHAPIRO,)	
)	
Defendant.)	
)	
)	

I, Daniel M. Shanley, state and declare as follows:

1. I am an attorney at the law firm of SHANLEY, APC and an attorney of record for the United Brotherhood of Carpenters and Joiners of America (“UBC”) and the Pacific Northwest Regional Council of Carpenters (“Council”) in the above-captioned case.

2. I have personal knowledge of the contents of this declaration, and could, and would, competently testify thereto if called before the Court to do so.

3. I attended law school at Suffolk University Law School in Boston, Massachusetts and received my Juris Doctor degree.

1 4. I have been engaged in the practice of law for approximately 30 years.

2 5. I am a member in good standing of the Washington State Bar.

3 6. My Washington State Bar number is 41253.

4 7. In 2021 and continuing through the present, my firm provided representation to
5 the UBC and the Council in connection with an investigation into corruption and
6 mismanagement at the Council, including allegations of vote rigging in Council membership
7 votes, and the administration of its affairs, including labor and employment issues.

8 8. As part of that representation in 2021, in anticipation of potential legal action, and
9 for the purposes of providing legal advice to the Council, attorneys from my law firm, including
10 myself, engaged in confidential communications with the Council through its then-Executive
11 Secretary-Treasurer, Evelyn Shapiro, and others, about corruption and mismanagement at the
12 Council and the administration of Council affairs, including labor and employment issues.
13 Shapiro has never retained SHANLEY, APC (or my predecessor firm, DeCarlo & Shanley) to
14 represent her personally with respect to the Council, and we never did represent Shapiro.

15 9. Specifically, in the latter part of 2021, I engaged in confidential communications
16 with the Council, through Shapiro, for purposes of providing legal advice to the Council
17 regarding certain bargaining agreements to which Shapiro referred on page 2, lines 23-25 in her
18 motion to dismiss, dated April 7, 2022. I also engaged in confidential communications with the
19 Council, through Shapiro, for purposes of providing legal advice to the Council regarding the
20 Council as employer, including in connection with an election certification by the National Labor
21 Relations Board which Shapiro falsely characterizes on page 2, lines 18-22. This advice
22 concerned legal interpretations of the Council's Bylaws and the UBC's Constitution, and legal
23 interpretations of duties and obligations under these agreements, certain collective bargaining
24 agreements, federal common law, the Labor Management Reporting and Disclosure Act and the
25 National Labor Relations Act.

26 10. The Council has not waived any privileges as it relates to the matters described
27 herein.

28 I declare under penalty of perjury that the above statements are true and correct.

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Executed this 25th day of April, 2022, in Sydney, Australia.

/s/ Daniel M. Shanley
Daniel M. Shanley